

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re: Case No. 24-30760
Chapter 7
Minnesota Implant Center, P.L.L.C.,
Debtor.

**NOTICE OF HEARING AND MOTION FOR ORDER AUTHORIZING EXAMINATIONS
AND RELATED DOCUMENT PRODUCTION
PURSUANT TO RULE 2004**

TO: The debtor and other entities specified in the applicable Federal Rules of Bankruptcy Procedure and Local Rule 9013-2.

1. Nauni Manty, the chapter 7 trustee of the bankruptcy estate of Minnesota Implant Center, P.L.L.C., moves the court for authorization to conduct Rule 2004 examinations and gives notice of hearing.

2. The court will hold a hearing on this motion on **Thursday, May 2, 2024, at 10:30 a.m.** in Courtroom 8W, at the Diana E. Murphy United States Courthouse, 300 South Fourth Street, in Minneapolis, Minnesota 55415.

3. Any response to this motion must be filed and served not later than **Thursday, April 25, 2024**, which is seven days before the time set for the hearing (including Saturdays, Sundays, and holidays). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY SERVED AND FILED, THE COURT MAY ENTER AN ORDER GRANTING THE REQUESTED RELIEF WITHOUT A HEARING.**

4. This court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334, Fed. R. Bankr. P. 5005 and Local Rule 1070-1. This proceeding is a core proceeding. The petition commencing the chapter 7 bankruptcy case was filed on March 22, 2024. This case is now pending in this court.

5. This motion arises under Fed. R. Bankr. P. 2004. This motion is filed pursuant to Fed. R. Bankr. P. 9014 and Local Rules 9013-1 and 9013-2.

6. The trustee seeks to examine C T Corporation System and Wolters Kluwer.

7. C T Corporation System recorded a UCC-1 Financing Statement against the debtor. *See* Ex. A. The trustee contacted CT about the financing statement and requested copies of the underlying loan documents. CT or Wolters Kluwer responded, indicating it filed the financing statement on behalf of another entity and refused to identify the entity. They likewise refused to provide any information or records of the underlying loan documents.

8. The trustee seeks to examine CT and Wolters Kluwer to determine the secured party purporting to have a security interest in the debtor's assets.

9. The information sought pursuant to Rule 2004 is necessary because it relates directly to the assets and liabilities of the debtor, which affect the administration of this estate.

WHEREFORE, the trustee respectfully requests that this court enter an order:

1. Authorizing the trustee to conduct an examination of C T Corporation System and Wolters Kluwer United States, Inc. pursuant to Fed. R. Bankr. P. 2004.

2. Granting the trustee such other and further relief as may be just and appropriate.

Dated: April 18, 2024

MANTY & ASSOCIATES, P.A.

By: s/ Mary F. Sieling
Mary F. Sieling (#389893)
Nauni Manty (#230352)
150 South Fifth Street #3125
Minneapolis, MN 55402
(612) 465-0990
mary@mantylaw.com

Attorneys for the Trustee